

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH THOMAS	:	CIVIL ACTION
and JOANNE THOMAS, h/w	:	
	:	
Plaintiffs	:	
	:	
v	:	NO. 02-3269
	:	
ABX AIR, INC., PAC NATIONAL	:	
MEESE, INC. TRI-LINK TECHNOLOGIES:	:	
AND GRANGER INDUSTRIES, INC	:	

**ANSWER OF THIRD PARTY PLAINTIFF, ABX AIR, INC.,
TO COUNTERCLAIM OF THIRD PARTY DEFENDANT, MEESE, INC.**

1. Answering defendant incorporates by reference herein its previously filed Third-Party Complaint as set forth fully herein at length.
2. Denied. Answering defendant is advised by counsel, and therefore, avers that the allegations contained in corresponding paragraph are automatically deemed denied as conclusions of law to which no responsive pleading is required. Strict proof thereof is demanded at the time of trial, if material.

WHEREFORE, answering defendant ABX Air, Inc., demands judgment in its favor and against third party defendant Meese, Inc. for indemnity and/or contribution and/or other relief the Court deems appropriate.

MINTZER, SAROWITZ, ZERIS, LEDVA & MEYERS

BY: _____
STEPHEN LEDVA, JR., ESQUIRE
Attorney for Defendant(s):

VERIFICATION

The averments or denials of facts contained in the foregoing are true, based upon the signer's personal knowledge or information and belief. If the foregoing contains averments which are consistent in fact, signer has been unable, after reasonable investigation, to ascertain which of the inconsistent averments are true, but signer has knowledge or information sufficient to form a belief that one of them is true. This Verification is made subject to the penalties of *18 Pa.C.S. §4904* relating to unsworn falsification to authorities.

STEPHEN LEDVA, JR.

Dated: June 2, 2003

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH THOMAS	:	CIVIL ACTION
and JOANNE THOMAS, h/w	:	
	:	
Plaintiffs	:	
	:	
v.	:	NO. 02-3269
	:	
ABX AIR, INC., PAC NATIONAL	:	
MEESE, INC. TRI-LINK TECHNOLOGIES:	:	
AND GRANGER INDUSTRIES, INC	:	

CERTIFICATE OF SERVICE

I, STEPHEN LEDVA, JR., ESQUIRE, hereby certify that a true copy of Defendant ABX AIR, INC.'s Reply to Third Party Defendant Meese's Counterclaim was served upon the following by First Class U.S. Mail, postage pre-paid on June ___, 2003.

Thomas F. Sacchetta, Esquire
SACCHETTA & BALDINO
 308 East Second Street
 Media, PA 19063

Robert Davis, Esquire
 1525 Locust Street
 14t Floor
 Philadelphia, PA 19102

Marc Ullom, Esquire
LAW OFFICES OF ANNA WALDHERR
 1500 John F. Kennedy Boulevard
 Suite 1120
 Philadelphia, PA 19102

Walter J. Timby, III, Esquire
 4th Floor Independence Square West
 The Curtis Center
 Philadelphia, PA 19102

MINTZER, SAROWITZ, ZERIS,
 LEDVA & MEYERS

BY: _____
 STEPHEN LEDVA, JR., ESQUIRE
 Attorney for Defendant, ABX AIR, INC.